

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA

v.

Criminal No. 3:18-cr-00007-TLW

BERNARD THIMOTHY TOBIAS

**FIRST MOTION FOR EXTENSION OF TIME TO REPLY TO UNITED STATES'
RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION FOR COMPASSIONATE
RELEASE**

COMES Defendant, Bernard Timothy Tobias ("Tobias"), appearing *pro se*, and files his Motion for Extension of Time to Reply to United States' Response in Opposition to Defendant's Motion for Compassionate Release, and would show as follows:

PRELIMINARY STATEMENT

As a preliminary matter, Williams respectfully requests that this Court be mindful that *pro se* complaints are to be held "to less stringent standards than formal pleadings drafted by lawyers," and should therefore be liberally construed. See *Clark v. Cartledge*, 829 F.3d 303 (4th Cir. 2016); *Estelle v. Gamble*, 429 U.S. 97 (1976) (same); and *Haines v. Kerner*, 404 U.S. 519 (1972) (same).

REASON FOR EXTENSION

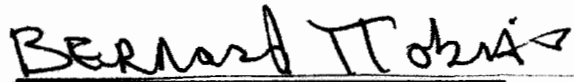
The eleven (11) page single spaced United States' Response in Opposition to Defendant's Motion for Compassionate Release, ("USR") was just received by Tobias through the prison mail, which has become unreliable and sporadic since the Covid/Delta Virus pandemic. It can take weeks or more often to receive mail. Further, the compound at FCI Bennettsville has had very limited access to the prison law library since the pandemic. Because of these limitations, Tobias needs more

time to research, prepare and perfect his Reply to the USR. Therefore, he seeks a thirty (30) day extension of time, up to and including August 27, 2023, to complete his Reply.

WHEREFORE, premise considered, Tobias prays that the Court grant this motion and extend his deadline for filing his Reply, up to and including, August 27, 2023.

Respectfully submitted,

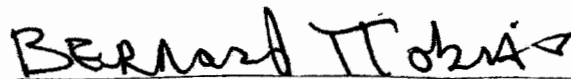
Dated: July 27, 2023



Bernard Tobias
Reg. No. 95170-071
FCI BENNETTSVILLE
FEDERAL CORR. INSTITUTION
P.O. BOX 52020
BENNETTSVILLE, SC 29512

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2023, I mailed a true and correct copy of the above and foregoing Motion for Extension of Time to Reply to United States' Response in Opposition to Defendant's Motion for Compassionate Release, postage prepaid, to Lamar J. Fyall, Assistant United States Attorney, United States Attoreny's Office, 1441 Main street, Suite 500, Columbia, SC 29201.



BERNARD THIMOTHY TOBIAS